

**MEMO ENDORSED**

Hon. Sylvia O. Hinds-Radix  
*Corporation Counsel*

THE CITY OF NEW YORK  
 LAW DEPARTMENT  
 100 CHURCH STREET  
 NEW YORK, NY 10007

Eric Proshansky  
*Assistant Corporation Counsel*  
 telephone (212) 356.2032  
 facsimile (212) 356.2038  
 eproshan@law.nyc.gov

May 10, 2022

The Honorable Valerie E. Caproni  
 United States District Court  
 Southern District of New York  
 New York, New York 10007

RE: *The City of New York v. Philadelphia Indemnity Ins. Co.,*  
 Civil Action No.: 22-cv-2248 (VEC)

Dear Judge Caproni:

This office represents the City of New York (“City”) in this matter. As Your Honor may recall, the Court has scheduled a preliminary conference in this matter for May 23, 2022, which now precedes the May 24, 2022 date on which Philadelphia must respond to the amended complaint. In addition, I will be returning from an overseas trip on May 23<sup>rd</sup> during the time slated for the conference.

With Philadelphia’s consent, the City respectfully requests an adjournment of the preliminary conference to a date convenient to the Court. This is the first such request.

Thank you for your attention to this matter.

Respectfully submitted,

s/

Eric Proshansky

cc All counsel (by ecf)

Application GRANTED. The initial pre-trial conference scheduled for May 20, 2022, is hereby ADJOURNED to **Friday, May 27, 2022 at 10:30 a.m.** The parties' joint submissions are due by no later than **Thursday, May 19, 2022**. All parties must attend by dialing 1-888-363-4749, using the access code 3121171, and the security code 2248. All attendees are advised to mute their phones when not speaking and to self-identify each time they speak. Recording or rebroadcasting the proceeding is strictly prohibited by law.

SO ORDERED.

A handwritten signature in blue ink that reads 'Valerie Caproni'.

Date: 5/10/2022

HON. VALERIE CAPRONI  
 UNITED STATES DISTRICT JUDGE